

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

SHANNON O'BRIEN,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:24-cv-00605
)	
FRONTIER AIRLINES, INC., d/b/a)	Honorable Sharon Johnson Coleman
FRONTIER AIRLINES,)	
)	Magistrate Judge M. David Weisman

**THE PARTIES' JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE FACT
DISCOVERY AND DEPOSITIONS**

NOW COME the Plaintiff, SHANNON O'BRIEN, by and through her attorneys, SALVI, SCHOSTOK & PRITCHARD, P.C., and the Defendant FRONTIER AIRLINES, INC., by and through its attorneys, FITZPATRICK, HUNT & PAGANO, LLP, and request this Honorable Court grant an extension of time to complete fact discovery and depositions in the above-captioned matter for the reasons set forth below:

1. Counsel for both parties are still actively litigating this matter.
2. Plaintiff and Defendant have responded to written discovery. However, Frontier cannot produce relevant excerpts from its Customer Service Manual and Flight Attendant Manual at this time because such material has been marked as Sensitive Security Information ("SSI") pursuant to 49 CFR Part 1520. Release of SSI is prohibited under SSI Regulations. Therefore, prior to releasing records which may contain SSI to persons who are not authorized to access SSI under the SSI Federal Regulations, the SSI language must be removed/redacted by the Transportation Security Administration ("TSA") SSI Program office. The process of removing/redacting SSI language is referred to as an SSI determination.
3. Before SSI marked material can be disclosed, the TSA must complete an SSI

determination. An SSI determination is typically an extended process. Frontier has submitted a formal request for the completion of such determination with respect to material deemed responsive to Plaintiff's written discovery requests. Such material has been submitted to the TSA for its review.

4. The parties agree that the completion of all necessary depositions cannot be completed until after the manual excerpts are produced subject to the TSA's SSI determination.

5. As such, the parties have conferred and agree that they require additional time to complete fact discovery and depositions.

6. This Honorable Court has ordered that all fact discovery in this matter be completed by September 30, 2024.

7. The parties ask this Honorable Court to extend the fact discovery closure date by 60+ days (accounting for the Thanksgiving holiday), until December 2, 2024.

WHEREFORE, the Plaintiff, SHANNON O'BRIEN, by and through her attorneys, SALVI, SCHOSTOK & PRITCHARD, P.C., and the Defendant FRONTIER AIRLINES, INC., by and through its attorneys, FITZPATRICK, HUNT & PAGANO, LLP, respectfully request that this Honorable Court extend the time to complete fact discovery and for any other relief this Court deems just.

Dated: August 26, 2024

Respectfully Submitted,

SALVI, SCHOSTOK & PRITCHARD, P.C.

By: /s/ Lance D. Northcutt

One of the Attorneys for Plaintiff

FITZPATRICK, HUNT & PAGANO, LLP

By: /s/ Brian T. Maye

One of the Attorneys for Defendant

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